

### **Remarks**

Entry of the amendments presented and allowance of all pending claims are respectfully requested. Claims 1-41 remain pending.

In response to the objection to the specification, pages 1 and 10 have been amended to provide application and/or patent numbers.

The drawings have been amended to overcome the objection thereto. In particular, Fig. 1 has been amended to add the descriptive label "CLIENT" to item 101a, and the label "ROUTER" to item 102a. Fig. 2 has been amended in the same manner as Fig. 1. Fig. 3 has been amended to add the descriptive label "ROUTER" to item 302, and the label "SPECIAL ROUTER" to item 310. The applicants respectfully submit that there is no item 312 in Fig. 3 to which to add a label. As all item numbers have a label in Fig. 3, the applicants believe that Fig. 3 includes all needed labels. Particularly as amended, the drawings are believed to conform with the requirements of 37 CFR 1.83.

Claims 2 and 20 have been rewritten in independent form. Claims 2 and 20 were deemed allowable if rewritten and are thus now in condition for allowance.

The applicants respectfully traverse the rejection of claims 1, 19 and 38 under 35 USC 103(a) on Lamport et al.

Lamport et al. describe a reconfiguration system for a high-speed mesh connected local area network. In particular, the network provides automatic packet switching and routing between host computers coupled to the network. A plurality of cut-through, non-blocking switches are interconnected with one another and are coupled to the host computers by point-to-point duplex links. The reconfiguration system automatically reconfigures the network whenever a new link or switch is added to the network, and whenever a link or switch fails.

Upon initiation of reconfiguration during phase one, as described in Lamport et al., column 42, lines 26-47, all packets which the switch may be in the process of transmitting are cleared, and “stop flow” signals are sent to all hosts that are coupled to the switch. Next, the reconfiguration program clears all information in its port information array. When phase two begins, all information about the network’s topology that is derived from external sources is discarded because it may be incorrect.

By way of contrast to Lamport et al., as recited in claims 1, 19 and 38, the applicants provide for “quiescing the routing network to preserve a first-in first out ordering of data messages within the routing network” before reconfiguring the network. The applicants respectfully take note of the Official Notice in the Office Action with respect to maintaining queued data packets. However, the applicants respectfully submit that Lamport et al. actually teach away from maintaining queued data packets, and thus preserving a FIFO ordering of data messages, as the applicants do, by clearing all packets upon initiation of reconfiguration. The clearing of all packets by Lamport et al. is directly contrary to the applicant’s preservation of FIFO ordering of data messages during quiescing. Therefore, the applicants’ invention, as recited in claims 1, 19 and 38 is not rendered obvious by Lamport et al. under 35 USC 103(a).

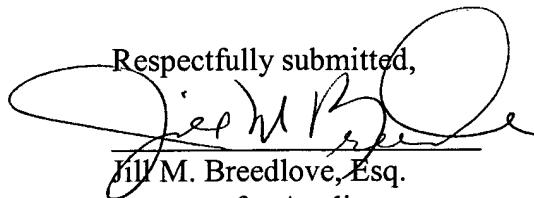
The applicants respectfully traverse the rejection of claims 1, 6-7, 19, 24-25 and 38-41 under 35 USC 103(a) on Banavar et al. in view of Lamport et al.

Banavar et al. describe a publish/subscribe system using a group-based multicast. It is noted in the Office Action that Banavar et al. do not describe quiescing the publish/subscribe system, nor reconfiguring the quiesced publish/subscribe system. The applicants respectfully submit that the deficiencies of Lamport et al., as described hereinabove, are not cured by Banavar et al. with respect to “quiescing the routing network to preserve a first-in first-out ordering of data messages within the routing network,” as recited by the applicants in claims 1, 19 and 38, and hence the claims dependent therefrom. Therefore, claims 1, 6-7, 19, 24-25 and 38-41 are believed to be patentable to the applicants over the suggested combination of Banavar et al. and Lamport et al. under 35 USC 103.

In view of the foregoing, the applicants respectfully request withdrawal of the rejections under 35 USC 103 and a Notice of Allowability for claims 1-41.

Should the Examiner wish to discuss this application further, the Examiner is invited to telephone applicants' below-listed representative.

Respectfully submitted,



Jill M. Breedlove, Esq.  
Attorney for Applicants  
Reg. No. 32,684

Dated: October 9, 2003

HESLIN ROTHENBERG FARLEY & MESITI P.C.  
5 Columbia Circle  
Albany, New York 12203  
Telephone: (518) 452-5600  
Facsimile: (518) 452-5579

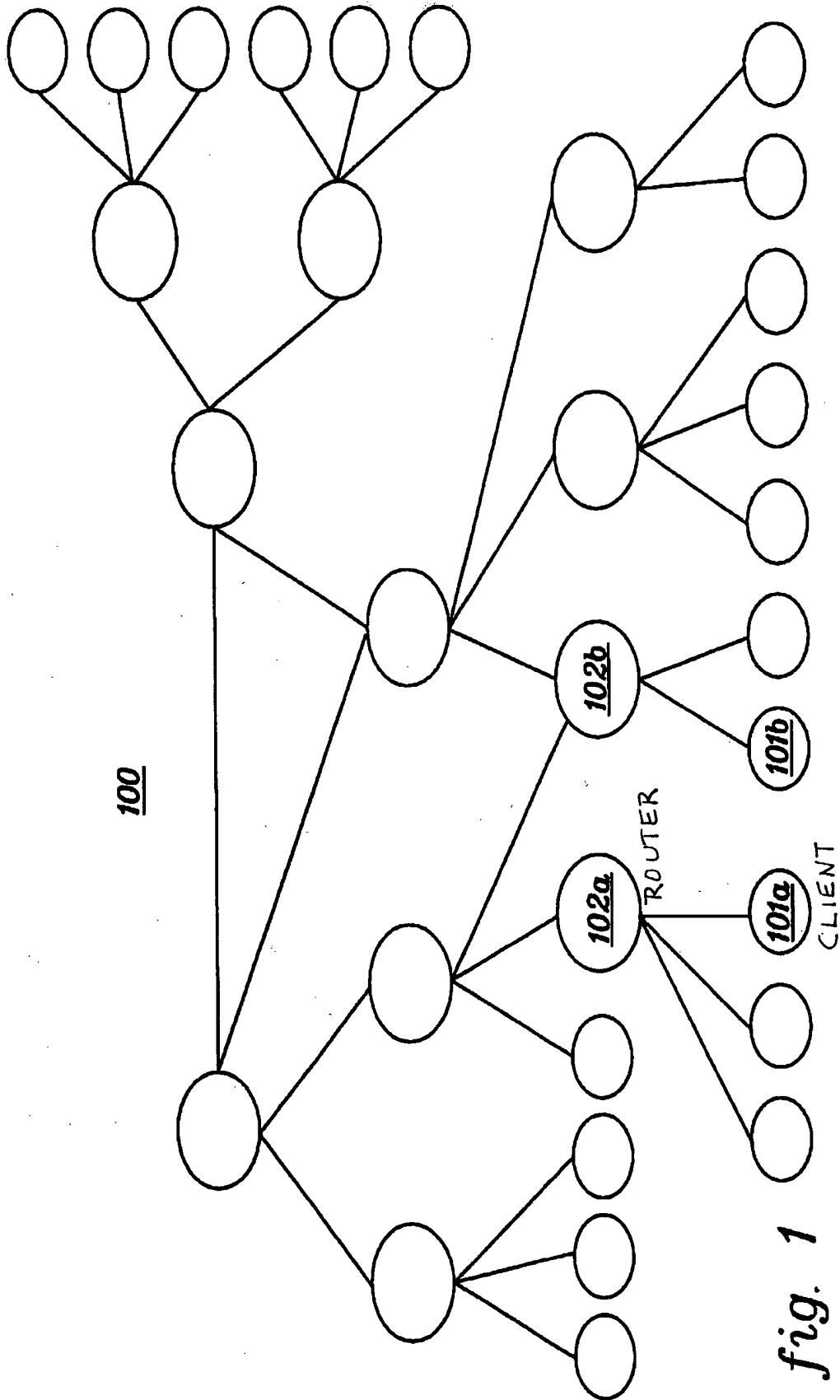


fig. 1

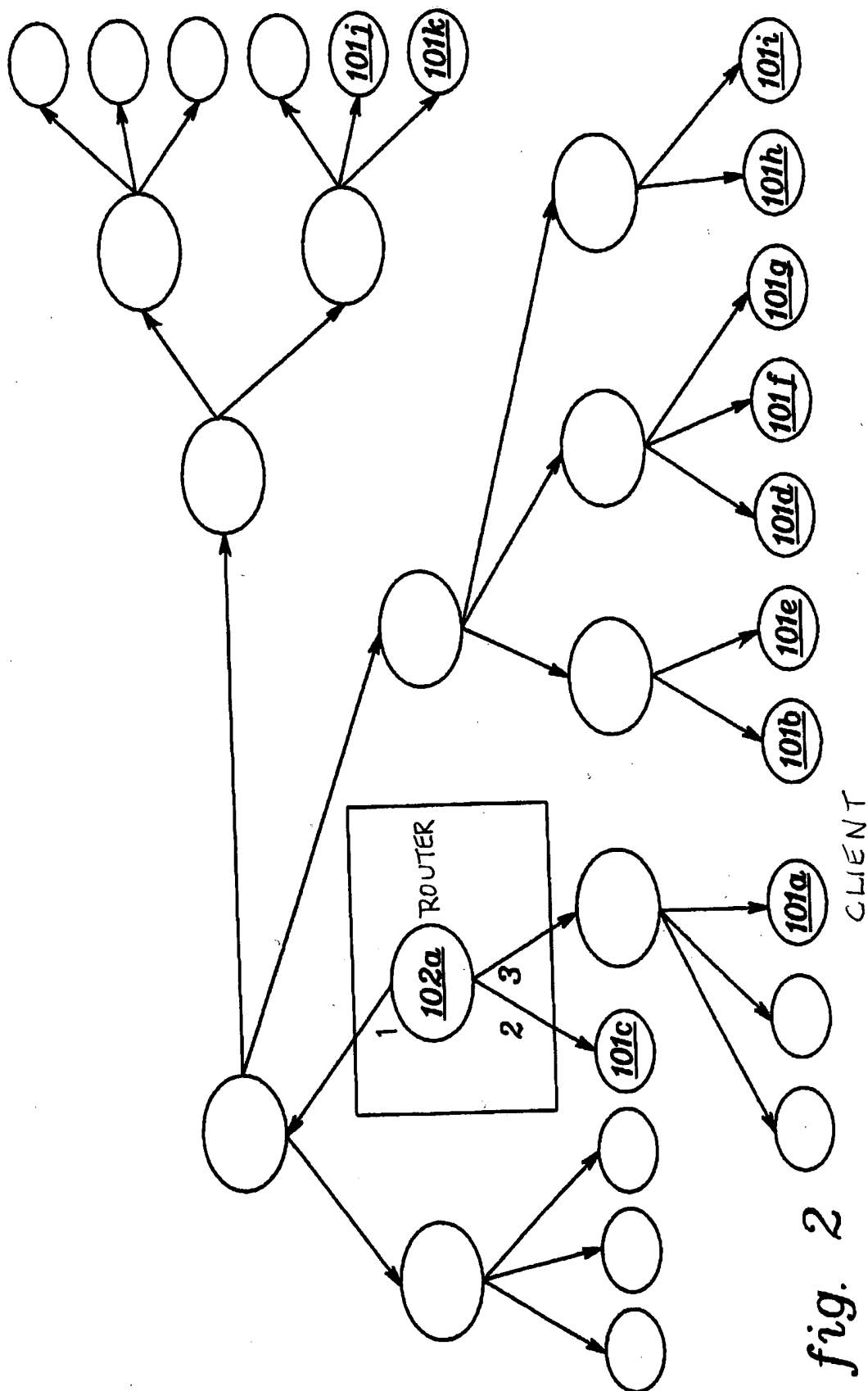


fig. 2

